

**GOLDEN GOODRICH LLP**

David M. Goodrich, State Bar No. 208675

[dgoodrich@go2.law](mailto:dgoodrich@go2.law)

Anerio V. Altman, State Bar No. 228445

[aaltman@go2.law](mailto:aaltman@go2.law)

3070 Bristol Street, Suite 640

Costa Mesa, California 92626

Telephone: 714-966-1000

Facsimile: 714-966-1002

Attorneys for Certain Defendants

**UNITED STATES BANKRUPTCY COURT**

**CENTRAL DISTRICT OF CALIFORNIA**

**SANTA ANA DIVISION**

In re:

The Litigation Practice Group P.C.,

Debtor.

Richard A. Marshack, Trustee of the LPG  
Liquidation Trust,

Plaintiff,

v.

Oxford Knox, LLC, a Delaware limited liability company; Buffalo 21 Partners, Inc., a Wyoming corporation; Jason Dovalina, individually; Rachel Dovalina, individually; Syed Faisal Gilani aka Sye Gilani, Individually; BAE Enterprises, Inc., a Wyoming corporation; Samson Ly, individually; BEW Solar Management, LLC, a California limited liability company; Lexicon Consulting, LLC, a Colorado limited liability company; United Partnerships, LLC, a Florida limited liability company; Ventura Consulting, LLC, a Nevada limited liability company; Matthew Church, individually; Frank Brown, individually; Validation, LLC, a terminated California limited liability company; Spectrum Payment Solutions, LLC, a California limited liability company; Home Energy Solutions, Inc., a California corporation; JNR Services, Inc., a California corporation; C.A.T. Exteriors, Inc., an Arizona

Chapter 11

Case No. 8:23-bk-10571-SC

Adv No. 8:25-ap-01208-SC

**DEFENDANTS LEXICON CONSULTING, LLC, UNITED PARTNERSHIPS, LLC AND VENTURA CONSULTING, LLC'S ANSWER TO TRUSTEE'S SECOND AMENDED COMPLAINT FOR:**

- (1) AVOIDANCE, RECOVERY, AND PRESERVATION OF PREFERENTIAL TRANSFERS MADE TO OR FOR CERTAIN DEFENDANTS MADE WITHIN NINETY DAYS OF THE PETITION DATE;**
- (2) AVOIDANCE, RECOVERY, AND PRESERVATION OF POST-PETITION TRANSFERS MADE TO OR FOR THE BENEFIT OF CERTAIN DEFENDANTS;**
- (3) AVOIDANCE OF DEBTOR'S EXECUTION OF REPAYMENT AGREEMENT WITH DEFENDANT OXFORD KNOX, LLC PURSUANT TO 11 U.S.C. §§ 548(a), 550, AND 551;**
- (4) AVOIDANCE, RECOVERY, AND PRESERVATION OF FRAUDULENT TRANSFER(S) PURSUANT TO 11 U.S.C. §§ 548(a), 550, AND 551;**
- (5) AVOIDANCE, RECOVERY, AND PRESERVATION OF FRAUDULENT TRANSFER(S) PURSUANT TO 11 U.S.C. §§ 548(a), 550, AND 551;**

corporation; and INVESTLINE Wealth Services,  
Inc., a California corporation,

Defendants.

- (6) AVOIDANCE, PRESERVATION, AND RECOVERY OF VOIDABLE TRANSFERS MADE WITH INTENT TO DEFRAUD [11 U.S.C. §§ 548. (a), 550, AND 551; CAL. CIV. CODE §§3439.04(a)(1) AND 3439.07]
- (7) AVOIDANCE, PRESERVATION, AND RECOVERY OF VOIDABLE TRANSFERS MADE WITH NO INTENT TO DEFRAUD [11 U.S.C. §§ 548(a), 550, AND 551; CAL. CIV. CODE §§ 3439.04(a)(2), 3439.05, AND 3439.07]
- (8) AVOIDANCE, RECOVERY, AND PRESERVATION OF FRAUDULENT TRANSFERS MADE TO OR FOR THE BENEFIT OF DEFENDANTS GILANI AND DOVALINA ARISING FROM USE OF AMERICAN EXPRESS CARD; and
- (9) OBJECTION TO PROOF OF CLAIM NO 818 OF OXFORD KNOX, LLC

Honorable Scott C. Clarkson  
Dept. 5C

Defendants Lexicon Consulting, LLC, a Colorado limited liability company, United Partnerships, LLC, a Florida limited liability company, and Ventura Consulting, LLC, a Nevada limited liability company (collectively “Defendants”) hereby file this joint answer to the *Trustee’s Second Amended Complaint for (1) Avoidance Preservation Of Preferential, Recovery, And Transfers Made to or for Certain Defendants Made Within Ninety Days of the Petition Date; (2) Avoidance, Recovery, and Preservation of Post-Petition Transfers Made to or for the Benefit Of Certain Defendants; (3) Avoidance of Debtor’s Execution of Repayment Agreement with Defendant Oxford Knox, LLC Pursuant To 11 U.S.C. §§ 548(a), 550, and 551; (4) Avoidance, Recovery, And Preservation Of Fraudulent Transfer(S) Pursuant To 11 U.S.C. §§ 548(a), 550, and 551; (5) Avoidance, Recovery, and Preservation Of Fraudulent Transfer(s) Pursuant To 11 U.S.C. §§ 548(a), 550, and 551; (6) Avoidance Voidable, Preservation, and Recovery of Transfers Made With Intent To Defraud [11 U.S.C. §§ 548 (a), 550, and 551; Cal. Civ. Code §§ 3439.04(a)(2), and 3439.07]; ((7) Avoidance, Preservation, and Recovery of Voidable Transfers Made With No Intent to Defraud [11 U.S.C. §§ 548(a), 550, and 551; Cal. Civ. Code §§ 3439.04(A)(2), 3439.05, And 3439.07]; (8) Avoidance, Recovery, and Preservation of Fraudulent Transfers Made to or for the Benefit of Defendants Gilani and Dovalina Arising From Use of American Express Card; and (9) Objection To Proof Of Claim No 818 Of Oxford Knox, LLC* (the

1 “Second Amended Complaint”) of Plaintiff Richard A. Marshack, Trustee of the LPG Liquidation  
2 Trust (“Plaintiff”), as follows:

3 **ANSWERS AND DENIALS**

4 1. Answering the allegations of paragraph 1, Defendants admit the allegations set forth  
5 therein.

6 2. Answering the allegations of paragraph 2, Defendants are without sufficient  
7 knowledge or information to form a belief as to the truth of the allegations asserted and therefore  
8 deny the allegations.

9 3. In response to Paragraph 3, Defendants state that such paragraph contains statements  
10 or conclusions of law to which no response is required. To the extent a response is required, the  
11 Defendants admit the allegations in Paragraph 3.

12 4. In response to Paragraph 4, Defendants state that such paragraph contains statements  
13 or conclusions of law to which no response is required. To the extent a response is required, the  
14 Defendants admit the allegations in Paragraph 4.

15 5. Answering the allegations of paragraph 5, Defendants are without sufficient  
16 knowledge or information to form a belief as to the truth of the allegations asserted and therefore  
17 deny the allegations.

18 6. Answering the allegations of paragraph 6, Defendants admit the allegations contained  
19 therein.

20 7. Answering the allegations of paragraph 7, Defendants admit the allegations contained  
21 therein.

22 8. Answering the allegations of paragraph 8, Defendants admit the allegations contained  
23 therein.

24 9. Answering the allegations of paragraph 9, Defendants admit the allegations contained  
25 therein.

26 10. Answering the allegations of paragraph 10, Defendants admit the allegations  
27 contained therein.  
28

1           11.     Answering the allegations of paragraph 11, Defendants admit the allegations  
2 contained therein.

3           12.     Answering the allegations of paragraph 12, Defendants admit the allegations  
4 contained therein.

5           13.     Answering the allegations of paragraph 13, Defendants admit the allegations  
6 contained therein.

7           14.     Answering the allegations of paragraph 14, Defendants admit the allegations  
8 contained therein.

9           15.     Answering the allegations of paragraph 15, Defendants admit the allegations  
10 contained therein.

11          16.     Answering the allegations of paragraph 16, Defendants admit the allegations  
12 contained therein.

13          17.     Answering the allegations of paragraph 17, Defendants admit the allegations  
14 contained therein.

15          18.     Answering the allegations of paragraph 18, Defendants admit the allegations  
16 contained therein.

17          19.     Answering the allegations of paragraph 19, Defendants admit the allegations  
18 contained therein.

19          20.     Answering the allegations of paragraph 20, Defendants admit the allegations  
20 contained therein.

21          21.     Answering the allegations of paragraph 21, Defendants admit the allegations  
22 contained therein.

23          22.     Answering the allegations of paragraph 22, Defendants admit the allegations  
24 contained therein.

25          23.     Answering the allegations of paragraph 23, Defendants admit the allegations  
26 contained therein.

27          24.     Answering the allegations of paragraph 24, Defendants admit the allegations  
28 contained therein.

1           25.     Answering the allegations of paragraph 25, Defendants admit the allegations  
2 contained therein.

3           26.     Answering the allegations of paragraph 26, Defendants admit the allegations  
4 contained therein.

5           27.     Answering the allegations of paragraph 27, Defendants admit the allegations  
6 contained therein.

7           28.     Answering the allegations of paragraph 28, Defendants admit the allegations  
8 contained therein.

9           29.     Answering the allegations of paragraph 29, Defendants admit the allegations  
10 contained therein.

11          30.     Answering the allegations of paragraph 30, Defendants admit the allegations  
12 contained therein.

13          31.     Answering the allegations of paragraph 31, Defendants admit the allegations  
14 contained therein.

15          32.     Answering the allegations of paragraph 32, Defendants admit the allegations  
16 contained therein.

17          33.     Answering the allegations of paragraph 33, Defendants admit the allegations  
18 contained therein.

19          34.     Answering the allegations of paragraph 34, Defendants admit the allegations  
20 contained therein.

21          35.     Answering the allegations of paragraph 35, Defendants admit the allegations  
22 contained therein.

23          36.     Answering the allegations of paragraph 36, Defendants admit the allegations  
24 contained therein.

25          37.     Answering the allegations of paragraph 37, Defendants admit the allegations  
26 contained therein.

27          38.     Answering the allegations of paragraph 38, Defendants admit the allegations  
28 contained therein.

1           39.     Answering the allegations of paragraph 39, Defendants admit the allegations  
2 contained therein.

3           40.     Answering the allegations of paragraph 40, Defendants admit the allegations  
4 contained therein.

5           41.     Answering the allegations of paragraph 41, Defendants admit the allegations  
6 contained therein.

7           42.     Answering the allegations of paragraph 42, Defendants admit the allegations  
8 contained therein.

9           43.     Answering the allegations of paragraph 43, Defendants admit the allegations  
10 contained therein.

11          44.     Answering the allegations of paragraph 44, Defendants admit the allegations  
12 contained therein.

13          45.     Answering the allegations of paragraph 45, Defendants admit the allegations  
14 contained therein.

15          46.     In response to Paragraph 46, Defendants state that such paragraph contains a  
16 definition of “Parties” to which no response is required. To the extent a response is required, the  
17 Defendants admit the allegations in Paragraph 46.

18          47.     Answer the allegations of paragraph 47, Defendants admit the allegations contained  
19 therein.

20          48.     Answer the allegations of paragraph 48, Defendants admit the allegations contained  
21 therein.

22          49.     Answer the allegations of paragraph 49, Defendants admit the allegations contained  
23 therein.

24          50.     Answering the allegations of paragraph 50, Defendants are without sufficient  
25 knowledge or information to form a belief as to the truth of the allegations asserted and therefore  
26 deny the allegations.

27          51.     Answer the allegations of paragraph 51, Defendants admit the allegations contained  
28 therein.

1           52.     Answering the allegations of paragraph 52, Defendants are without sufficient  
2 knowledge or information to form a belief as to the truth of the allegations asserted and therefore  
3 deny the allegations.

4           53.     Answer the allegations of paragraph 53, Defendants admit the allegations contained  
5 therein.

6           54.     Answer the allegations of paragraph 54, Defendants admit the allegations contained  
7 therein.

8           55.     Answer the allegations of paragraph 55, Defendants admit the allegations contained  
9 therein.

10          56.     Answering the allegations of paragraph 56, Defendants are without sufficient  
11 knowledge or information to form a belief as to the truth of the allegations asserted and therefore  
12 deny the allegations.

13          57.     Answering the allegations of paragraph 57, Defendants are without sufficient  
14 knowledge or information to form a belief as to the truth of the allegations asserted and therefore  
15 deny the allegations.

16          58.     Answering the allegations of paragraph 58, Defendants are without sufficient  
17 knowledge or information to form a belief as to the truth of the allegations asserted and therefore  
18 deny the allegations.

19          59.     Answering the allegations of paragraph 59, Defendants are without sufficient  
20 knowledge or information to form a belief as to the truth of the allegations asserted and therefore  
21 deny the allegations.

22          60.     Answering the allegations of paragraph 60, Defendants are without sufficient  
23 knowledge or information to form a belief as to the truth of the allegations asserted and therefore  
24 deny the allegations.

25          61.     Answering the allegations of paragraph 61, Defendants are without sufficient  
26 knowledge or information to form a belief as to the truth of the allegations asserted and therefore  
27 deny the allegations.

28

1           62.     Answering the allegations of paragraph 62, Defendants are without sufficient  
2 knowledge or information to form a belief as to the truth of the allegations asserted and therefore  
3 deny the allegations.

4           63.     Answering the allegations of paragraph 63, Defendants are without sufficient  
5 knowledge or information to form a belief as to the truth of the allegations asserted and therefore  
6 deny the allegations.

7           64.     Answering the allegations of paragraph 64, Defendants are without sufficient  
8 knowledge or information to form a belief as to the truth of the allegations asserted and therefore  
9 deny the allegations.

10          65.     Answering the allegations of paragraph 65, Defendants are without sufficient  
11 knowledge or information to form a belief as to the truth of the allegations asserted and therefore  
12 deny the allegations.

13          66.     Answering the allegations of paragraph 66, Defendants are without sufficient  
14 knowledge or information to form a belief as to the truth of the allegations asserted and therefore  
15 deny the allegations.

16          67.     In response to Paragraph 67, Defendants state that such paragraph contains statements  
17 or conclusions of law to which no response is required. To the extent a response is required,  
18 Defendants are without sufficient knowledge or information to form a belief as to the truth of the  
19 allegations asserted and therefore deny the allegations.

20          68.     In response to Paragraph 68, Defendants state that such paragraph contains statements  
21 or conclusions of law to which no response is required. To the extent a response is required,  
22 Defendants are without sufficient knowledge or information to form a belief as to the truth of the  
23 allegations asserted and therefore deny the allegations.

24          69.     In response to Paragraph 69, Defendants state that such paragraph contains statements  
25 or conclusions of law to which no response is required. To the extent a response is required,  
26 Defendants are without sufficient knowledge or information to form a belief as to the truth of the  
27 allegations asserted and therefore deny the allegations.

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1           70.     Answering the allegations of paragraph 70, Defendants are without sufficient  
2 knowledge or information to form a belief as to the truth of the allegations asserted and therefore  
3 deny the allegations.

4           71.     In response to Paragraph 71, Defendants state that such paragraph contains statements  
5 or conclusions of law to which no response is required. To the extent a response is required,  
6 Defendants are without sufficient knowledge or information to form a belief as to the truth of the  
7 allegations asserted and therefore deny the allegations.

8           72.     In response to Paragraph 72, Defendants state that such paragraph contains statements  
9 or conclusions of law to which no response is required. To the extent a response is required,  
10 Defendants are without sufficient knowledge or information to form a belief as to the truth of the  
11 allegations asserted and therefore deny the allegations.

12           73.     Answering the allegations of paragraph 73, Defendants are without sufficient  
13 knowledge or information to form a belief as to the truth of the allegations asserted and therefore  
14 deny the allegations.

15           74.     Answering the allegations of paragraph 74, Defendants are without sufficient  
16 knowledge or information to form a belief as to the truth of the allegations asserted and therefore  
17 deny the allegations.

18           75.     Answering the allegations of paragraph 75, Defendants are without sufficient  
19 knowledge or information to form a belief as to the truth of the allegations asserted and therefore  
20 deny the allegations.

21           76.     Answering the allegations of paragraph 76, Defendants are without sufficient  
22 knowledge or information to form a belief as to the truth of the allegations asserted and therefore  
23 deny the allegations.

24           77.     Answering the allegations of paragraph 77, Defendants admit the allegations  
25 contained therein.

26           78.     Answering the allegations of paragraph 78, Defendants admit the allegations  
27 contained therein.

28

1           79.     Answering the allegations of paragraph 79, Defendants are without sufficient  
2 knowledge or information to form a belief as to the truth of the allegations asserted and therefore  
3 deny the allegations.

4           80.     Answering the allegations of paragraph 80, Defendants are without sufficient  
5 knowledge or information to form a belief as to the truth of the allegations asserted and therefore  
6 deny the allegations.

7           81.     Answering the allegations of paragraph 81, Defendants admit the allegations  
8 contained therein.

9           82.     Answering the allegations of paragraph 82, Defendants are without sufficient  
10 knowledge or information to form a belief as to the truth of the allegations asserted and therefore  
11 deny the allegations.

12          83.     In response to Paragraph 83, Defendants state that such paragraph contains statements  
13 or conclusions of law to which no response is required. To the extent a response is required,  
14 Defendants are without sufficient knowledge or information to form a belief as to the truth of the  
15 allegations asserted and therefore deny the allegations.

16          84.     Answering the allegations of paragraph 84, Defendants admit that the Debtor was not  
17 able to repay some of the amounts owed to Defendants, but deny the remaining allegations contained  
18 therein.

19          85.     Answering the allegations of paragraph 85, Defendants admit the certain Defendants  
20 lent money to an entity connected to Tony Diab and that approximately \$1,000,000 was paid into an  
21 escrow account to fund a down payment of Tony Diab's purchase of Arah's Bayrooti's shares in  
22 Coast, but the Defendants are without sufficient knowledge or information to form a belief as to the  
23 truth of the remaining allegations asserted and therefore deny the remaining allegations.

24          86.     Answering the allegations of paragraph 86, Defendants admit that some payments  
25 were made to partners of Oxford Knox, but the Defendants are without sufficient knowledge or  
26 information to form a belief as to the truth of the remaining allegations asserted and therefore deny  
27 the remaining allegations.

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1           87.     Answering the allegations of paragraph 87, Defendants (1) deny Validation was  
2     formed in 2021, and that Validation's true purposes and goal was the repayment of amounts to its  
3     members by the Debtor or Mr. Diab, (2) admit that some of the members of Validation are  
4     Defendants, and (3) are without sufficient knowledge or information to form a belief as to the truth  
5     of the remaining allegations asserted and therefore deny the remaining allegations.

6           88.     Answering the allegations of paragraph 88, Defendants (1) admit Validation was  
7     dissolved in 2022, (2) deny that the Debtor "paid" money to Validation (the Debtor served as a  
8     conduit of payment from third-parties to Validation), and (3) are without sufficient knowledge or  
9     information to form a belief as to the truth of the remaining allegations asserted and therefore deny  
10    the remaining allegations.

11          89.     Answering the allegations of paragraph 89, Defendants deny the allegations contained  
12    therein.

13          90.     Answering the allegations of paragraph 90, Defendants admit the allegations  
14    contained therein.

15          91.     Answering the allegations of paragraph 91, Defendants are without sufficient  
16    knowledge or information to form a belief as to the truth of the allegations asserted and therefore  
17    deny the allegations.

18          92.     Answering the allegations of paragraph 92, Defendants deny the allegations contained  
19    therein.

20          93.     Answering the allegations of paragraph 93, Defendants are without sufficient  
21    knowledge or information to form a belief as to the truth of the allegations asserted and therefore  
22    deny the allegations.

23          94.     Answering the allegations of paragraph 94, Defendants are without sufficient  
24    knowledge or information to form a belief as to the truth of the allegations asserted and therefore  
25    deny the allegations.

26          95.     Answering the allegations of paragraph 95, Defendants (1) admit certain Defendants  
27    entered into a repayment agreement for \$12,000,000 with the Debtor, with a \$10,000,000 balance  
28    increase upon the occurrence of certain events, (2) deny that Mr. Diab owned directly or partially an

1 interest in Oxford Knox, and (3) without sufficient knowledge or information to form a belief as to  
2 the truth of the remaining allegations asserted and therefore deny the remaining allegations.

3 96. Answering the allegations of paragraph 96, Defendants admit Proof of Claim No. 818  
4 is based the Repayment Agreement, as that term is defined in the Second Amended Complaint, but  
5 only in part, and denies the remainder of the remaining allegations.

6 97. Answering the allegations of paragraph 97, Defendants are without sufficient  
7 knowledge or information to form a belief as to the truth of the allegations asserted and therefore  
8 deny the allegations.

9 98. In response to Paragraph 98, Defendants state that such paragraph contains a  
10 definition of “Transfers” to which no response is required. To the extent a response is required, the  
11 Defendants admit the allegations in Paragraph 98.

12 99. In response to Paragraph 99, no allegations of fact are found. To the extent a response  
13 is required, Defendants are without sufficient knowledge or information to form a belief as to the  
14 truth of the allegations asserted and therefore deny the allegations.

15 100. Paragraph 100 contains no new allegations and therefore this incorporating alleges is  
16 admitted and denied as provided in the incorporated allegations.

17 101. In response to Paragraph 101, Defendants are without sufficient knowledge or  
18 information to form a belief as to the truth of the allegations asserted and therefore deny the  
19 allegations.

20 102. In response to Paragraph 102, Defendants are without sufficient knowledge or  
21 information to form a belief as to the truth of the allegations asserted and therefore deny the  
22 allegations.

23 103. In response to Paragraph 103, Plaintiff’s allegations relating to a definition allegedly  
24 found in § 547(b)(1) is a statement or conclusion of law to which no response is required. In response  
25 to the remaining allegations in Paragraph 103, Defendants are without sufficient knowledge or  
26 information to form a belief as to the truth of the allegations asserted and therefore deny the  
27 allegations.

1           104. In response to Paragraph 104, Defendants are without sufficient knowledge or  
2 information to form a belief as to the truth of the allegations asserted and therefore deny the  
3 allegations.

4           105. In response to Paragraph 105, Plaintiff's allegations relating to a definition of debt,  
5 allegedly found in the Bankruptcy Code, is a statement or conclusion of law to which no response is  
6 required. In response to the remaining allegations in Paragraph 105, Defendants are without sufficient  
7 knowledge or information to form a belief as to the truth of the allegations asserted and therefore  
8 deny the allegations.

9           106. In response to Paragraph 106, Plaintiff's allegations relating to a presumption  
10 allegedly found in § 547(f) is a statement or conclusion of law to which no response is required. In  
11 response to the remaining allegations in Paragraph 106, Defendants are without sufficient knowledge  
12 or information to form a belief as to the truth of the allegations asserted and therefore deny the  
13 allegations.

14           107. In response to Paragraph 107, Defendants are without sufficient knowledge or  
15 information to form a belief as to the truth of the allegations asserted and therefore deny the  
16 allegations.

17           108. Paragraph 108 alleges the Plaintiff's "reservation of rights under §§ 547 and 550" and  
18 require no response. To the extent a response is required, Defendants are without sufficient  
19 knowledge or information to form a belief as to the truth of the allegations asserted and therefore  
20 deny the allegations.

21           109. In response to Paragraph 109, Defendants are without sufficient knowledge or  
22 information to form a belief as to the truth of the allegations asserted and therefore deny the  
23 allegations.

24           110. Answering the allegations contained in Paragraph 110, Defendants deny each and  
25 every allegation set forth therein.

26           111. Paragraph 111 contains no new allegations and therefor this incorporating allegation  
27 is admitted and denied as provided in the incorporated allegations.

28

1           112. In response to Paragraph 112, Defendants admit the Second Amended Complaint  
2 contains allegations under §§ 549 and 550. To the extent the allegations in Paragraph 112 allege  
3 payments received a recoverable, Defendants deny such allegations.

4           113. Paragraph 113 alleges the Plaintiff's "reservation of rights under §§ 549 and 550" and  
5 require no response. To the extent a response is required, Defendants are without sufficient  
6 knowledge or information to form a belief as to the truth of the allegations asserted and therefore  
7 deny the allegations

8           114. In response to Paragraph 114, Defendants are without sufficient knowledge or  
9 information to form a belief as to the truth of the allegations asserted and therefore deny the  
10 allegations.

11           115. Paragraph 115 contains no new allegations and therefore this incorporating allegation  
12 is admitted and denied as provided in the incorporated allegations.

13           116. In response to Paragraph 116, Plaintiff's allegations relating to § 548(a)(1)(B) is a  
14 statement or conclusion of law to which no response is required. To the extent a response is required,  
15 Defendants are without sufficient knowledge or information to form a belief as to the truth of the  
16 allegations asserted and therefore deny the allegations.

17           117. Answering the allegations of paragraph 117, Defendants are without sufficient  
18 knowledge or information to form a belief as to the truth of the allegations asserted and therefore  
19 deny the allegations.

20           118. Answering the allegations of paragraph 118, Defendants are without sufficient  
21 knowledge or information to form a belief as to the truth of the allegations asserted and therefore  
22 deny the allegations.

23           119. Answering the allegations of paragraph 119, Defendants are without sufficient  
24 knowledge or information to form a belief as to the truth of the allegations asserted and therefore  
25 deny the allegations.

26           120. Answering the allegations of paragraph 120, Defendants deny each and every  
27 allegations set forth therein.

1           121. Answering the allegations of paragraph 121, Defendants deny each and every  
2 allegation set forth therein.

3           122. Paragraph 122 contains no new allegations and therefore this incorporating alleges is  
4 admitted and denied as provided in the incorporated allegations.

5           123. Answering the allegations of paragraph 123, Defendants are without sufficient  
6 knowledge or information to form a belief as to the truth of the allegations asserted and therefore  
7 deny the allegations.

8           124. Answering the allegations of paragraph 124, Defendants are without sufficient  
9 knowledge or information to form a belief as to the truth of the allegations asserted and therefore  
10 deny the allegations.

11           125. Answering the allegations of paragraph 125, Defendants are without sufficient  
12 knowledge or information to form a belief as to the truth of the allegations asserted and therefore  
13 deny the allegations.

14           126. Answering the allegations of paragraph 126, Defendants are without sufficient  
15 knowledge or information to form a belief as to the truth of the allegations asserted and therefore  
16 deny the allegations.

17           127. Answering the allegations of paragraph 127, Defendants are without sufficient  
18 knowledge or information to form a belief as to the truth of the allegations asserted and therefore  
19 deny the allegations.

20           128. Answering the allegations of paragraph 128, Defendants deny each and every  
21 allegation set forth therein.

22           129. Paragraph 129 contains no new allegations and therefore this incorporating alleges is  
23 admitted and denied as provided in the incorporated allegations.

24           130. Answering the allegations of paragraph 130, Defendants are without sufficient  
25 knowledge or information to form a belief as to the truth of the allegations asserted and therefore  
26 deny the allegations.

1           131. Answering the allegations of paragraph 131, Defendants are without sufficient  
2 knowledge or information to form a belief as to the truth of the allegations asserted and therefore  
3 deny the allegations.

4           132. Answering the allegations of paragraph 132, Defendants are without sufficient  
5 knowledge or information to form a belief as to the truth of the allegations asserted and therefore  
6 deny the allegations.

7           133. Answering the allegations of paragraph 133, Defendants are without sufficient  
8 knowledge or information to form a belief as to the truth of the allegations asserted and therefore  
9 deny the allegations.

10          134. Answering the allegations of paragraph 134, Defendants are without sufficient  
11 knowledge or information to form a belief as to the truth of the allegations asserted and therefore  
12 deny the allegations.

13          135. Answering the allegations of paragraph 135, Defendants are without sufficient  
14 knowledge or information to form a belief as to the truth of the allegations asserted and therefore  
15 deny the allegations.

16          136. Answering the allegations of paragraph 136, Defendants are without sufficient  
17 knowledge or information to form a belief as to the truth of the allegations asserted and therefore  
18 deny the allegations.

19          137. Answering the allegations of paragraph 137, Defendants are without sufficient  
20 knowledge or information to form a belief as to the truth of the allegations asserted and therefore  
21 deny the allegations.

22          138. Answering the allegations of paragraph 138, Defendants are without sufficient  
23 knowledge or information to form a belief as to the truth of the allegations asserted and therefore  
24 deny the allegations. .

25          139. Answering the allegations of paragraph 139, Defendants are without sufficient  
26 knowledge or information to form a belief as to the truth of the allegations asserted and therefore  
27 deny the allegations.

28



1 140. Answering the allegations of paragraph 140, Defendants deny each and every  
2 allegation set forth therein.

3 141. Paragraph 141 contains no new allegations and therefore this incorporating alleges is  
4 admitted and denied as provided in the incorporated allegations.

5 142. In response to Paragraph 142, Plaintiff's allegations relating to § 544(b)(1), California  
6 Civil Code §§ 3439.04(a)(1) and 3439.05, are statements or conclusions of law to which no response  
7 is required. To the extent a response is required, Defendants are without sufficient knowledge or  
8 information to form a belief as to the truth of the allegations asserted and therefore deny the  
9 allegations.

10 143. Answering the allegations of paragraph 143, Defendants are without sufficient  
11 knowledge or information to form a belief as to the truth of the allegations asserted and therefore  
12 deny the allegations.

13 144. Answering the allegations of paragraph 144, Defendants are without sufficient  
14 knowledge or information to form a belief as to the truth of the allegations asserted and therefore  
15 deny the allegations.

16 145. Answering the allegations of paragraph 145, Defendants are without sufficient  
17 knowledge or information to form a belief as to the truth of the allegations asserted and therefore  
18 deny the allegations.

19 146. Answering the allegations of paragraph 146, Defendants are without sufficient  
20 knowledge or information to form a belief as to the truth of the allegations asserted and therefore  
21 deny the allegations.

22 147. Answering the allegations of paragraph 147, Defendants deny each and every  
23 allegation set forth therein.

24 148. Answering the allegations of paragraph 148, Defendants are without sufficient  
25 knowledge or information to form a belief as to the truth of the allegations asserted and therefore  
26 deny the allegations.

27 149. Answering the allegations of paragraph 149, Defendants deny each and every  
28 allegation set forth therein.

1           150. Answering the allegations of paragraph 150, Defendants deny each and every  
2 allegation set forth therein.

3           151. Answering the allegations of paragraph 151, Defendants are without sufficient  
4 knowledge or information to form a belief as to the truth of the allegations asserted and therefore  
5 deny the allegations.

6           152. Answering the allegations of paragraph 152, Defendants are without sufficient  
7 knowledge or information to form a belief as to the truth of the allegations asserted and therefore  
8 deny the allegations.

9           153. Answering the allegations of paragraph 153, Defendants are without sufficient  
10 knowledge or information to form a belief as to the truth of the allegations asserted and therefore  
11 deny the allegations.

12           154. Answering the allegations of paragraph 154, Defendants are without sufficient  
13 knowledge or information to form a belief as to the truth of the allegations asserted and therefore  
14 deny the allegations.

15           155. Answering the allegations of paragraph 155, Defendants are without sufficient  
16 knowledge or information to form a belief as to the truth of the allegations asserted and therefore  
17 deny the allegations.

18           156. Answering the allegations of paragraph 156, Defendants are without sufficient  
19 knowledge or information to form a belief as to the truth of the allegations asserted and therefore  
20 deny the allegations.

21           157. Answering the allegations of paragraph 157, Defendants are without sufficient  
22 knowledge or information to form a belief as to the truth of the allegations asserted and therefore  
23 deny the allegations.

24           158. Answering the allegations of paragraph 158, Defendants are without sufficient  
25 knowledge or information to form a belief as to the truth of the allegations asserted and therefore  
26 deny the allegations.

27           159. Answering the allegations of paragraph 159, Defendants deny each and every  
28 allegation set forth therein.

1           160. Answering the allegations of paragraph 160, Defendants deny each and every  
2 allegation set forth therein.

3           161. Paragraph 161 contains no new allegations and therefore this incorporating alleges is  
4 admitted and denied as provided in the incorporated allegations.

5           162. In response to Paragraph 162, Plaintiff's allegations relating to § 544(b)(1), California  
6 Civil Code §§ 3439.04(a)(2) and 3439.05, are statements or conclusions of law to which no response  
7 is required. To the extent a response is required, Defendants are without sufficient knowledge or  
8 information to form a belief as to the truth of the allegations asserted and therefore deny the  
9 allegations.

10           163. Answering the allegations of paragraph 163, Defendants are without sufficient  
11 knowledge or information to form a belief as to the truth of the allegations asserted and therefore  
12 deny the allegations.

13           164. Answering the allegations of paragraph 164, Defendants are without sufficient  
14 knowledge or information to form a belief as to the truth of the allegations asserted and therefore  
15 deny the allegations.

16           165. Answering the allegations of paragraph 165, Defendants are without sufficient  
17 knowledge or information to form a belief as to the truth of the allegations asserted and therefore  
18 deny the allegations.

19           166. Answering the allegations of paragraph 166, Defendants are without sufficient  
20 knowledge or information to form a belief as to the truth of the allegations asserted and therefore  
21 deny the allegations.

22           167. Answering the allegations of paragraph 167, Defendants are without sufficient  
23 knowledge or information to form a belief as to the truth of the allegations asserted and therefore  
24 deny the allegations.

25           168. Answering the allegations of paragraph 168, Defendants are without sufficient  
26 knowledge or information to form a belief as to the truth of the allegations asserted and therefore  
27 deny the allegations.

28

1           169. Answering the allegations of paragraph 169, Defendants are without sufficient  
2 knowledge or information to form a belief as to the truth of the allegations asserted and therefore  
3 deny the allegations

4           170. Answering the allegations of paragraph 170, Defendants are without sufficient  
5 knowledge or information to form a belief as to the truth of the allegations asserted and therefore  
6 deny the allegations.

7           171. Answering the allegations of paragraph 171, Defendants are without sufficient  
8 knowledge or information to form a belief as to the truth of the allegations asserted and therefore  
9 deny the allegations.

10          172. Answering the allegations of paragraph 172, Defendants deny each and every  
11 allegation set forth therein.

12          173. Answering the allegations of paragraph 173, Defendants deny each and every  
13 allegation set forth therein.

14          174. Paragraph 174 contains no new allegations and therefore this incorporating alleges is  
15 admitted and denied as provided in the incorporated allegations.

16          175. Answering the allegations of paragraph 175, Defendants are without sufficient  
17 knowledge or information to form a belief as to the truth of the allegations asserted and therefore  
18 deny the allegations.

19          176. Answering the allegations of paragraph 176, Defendants are without sufficient  
20 knowledge or information to form a belief as to the truth of the allegations asserted and therefore  
21 deny the allegations.

22          177. Answering the allegations of paragraph 177, Defendants are without sufficient  
23 knowledge or information to form a belief as to the truth of the allegations asserted and therefore  
24 deny the allegations.

25          178. Answering the allegations of paragraph 178, Defendants are without sufficient  
26 knowledge or information to form a belief as to the truth of the allegations asserted and therefore  
27 deny the allegations.

28

1           179. Answering the allegations of paragraph 179, Defendants are without sufficient  
2 knowledge or information to form a belief as to the truth of the allegations asserted and therefore  
3 deny the allegations.

4           180. Answering the allegations of paragraph 180, Defendants are without sufficient  
5 knowledge or information to form a belief as to the truth of the allegations asserted and therefore  
6 deny the allegations.

7           181. Answering the allegations of paragraph 181, Defendants are without sufficient  
8 knowledge or information to form a belief as to the truth of the allegations asserted and therefore  
9 deny the allegations.

10          182. Answering the allegations of paragraph 182, Defendants are without sufficient  
11 knowledge or information to form a belief as to the truth of the allegations asserted and therefore  
12 deny the allegations.

13          183. Answering the allegations of paragraph 183, Defendants are without sufficient  
14 knowledge or information to form a belief as to the truth of the allegations asserted and therefore  
15 deny the allegations.

16          184. Answering the allegations of paragraph 184, Defendants are without sufficient  
17 knowledge or information to form a belief as to the truth of the allegations asserted and therefore  
18 deny the allegations.

19          185. Answering the allegations of paragraph 185, Defendants are without sufficient  
20 knowledge or information to form a belief as to the truth of the allegations asserted and therefore  
21 deny the allegations.

22          186. Answering the allegations of paragraph 186, Defendants are without sufficient  
23 knowledge or information to form a belief as to the truth of the allegations asserted and therefore  
24 deny the allegations.

25          187. Answering the allegations of paragraph 187, Defendants are without sufficient  
26 knowledge or information to form a belief as to the truth of the allegations asserted and therefore  
27 deny the allegations  
28

1 188. Answering the allegations of paragraph 188, Defendants are without sufficient  
2 knowledge or information to form a belief as to the truth of the allegations asserted and therefore  
3 deny the allegations.

4 189. Answering the allegations of paragraph 189, Defendants are without sufficient  
5 knowledge or information to form a belief as to the truth of the allegations asserted and therefore  
6 deny the allegations.

7 190. Answering the allegations of paragraph 190, Defendants are without sufficient  
8 knowledge or information to form a belief as to the truth of the allegations asserted and therefore  
9 deny the allegations.

10 191. Answering the allegations of paragraph 191, Defendants are without sufficient  
11 knowledge or information to form a belief as to the truth of the allegations asserted and therefore  
12 deny the allegations.

13 192. Answering the allegations of paragraph 192, Defendants are without sufficient  
14 knowledge or information to form a belief as to the truth of the allegations asserted and therefore  
15 deny the allegations.

16 193. Answering the allegations of paragraph 193, Defendants are without sufficient  
17 knowledge or information to form a belief as to the truth of the allegations asserted and therefore  
18 deny the allegations.

19 194. Answering the allegations of paragraph 194, Defendants are without sufficient  
20 knowledge or information to form a belief as to the truth of the allegations asserted and therefore  
21 deny the allegations.

22 195. Answering the allegations of paragraph 195, Defendants deny each and every  
23 allegation set forth therein.

24 196. Paragraph 196 contains no new allegations and therefore this incorporating alleges is  
25 admitted and denied as provided in the incorporated allegations.

26 197. In response to Paragraph 197, Plaintiff's allegations relating to § 502(b) is a statement  
27 or conclusion of law to which no response is required. To the extent a response is required,  
28

1 Defendants are without sufficient knowledge or information to form a belief as to the truth of the  
2 allegations asserted and therefore deny the allegations.

3 198. Answering the allegations of paragraph 198, Defendants admit that the Trustee has  
4 asked the Court to avoid the Debtor's execution of the Repayment Agreement as a fraudulent  
5 conveyance pursuant to 11 U.S.C. § 548, but denies the allegation that the Repayment Agreement is  
6 the sole basis for Oxford Knox's claim.

7 199. Answering the allegations of paragraph 199, Defendants deny each and every  
8 allegation set forth therein.

9 200. Answering the allegations of paragraph 200, Defendants are without sufficient  
10 knowledge or information to form a belief as to the truth of the allegations asserted and therefore  
11 deny the allegations.

12 201. Answering the allegations of paragraph 201, Defendants are without sufficient  
13 knowledge or information to form a belief as to the truth of the allegations asserted and therefore  
14 deny the allegations.

15 **AFFIRMATIVE DEFENSES**

16 Defendants further plead the following separate and additional affirmative defenses. By  
17 pleading these defenses, Defendants do not in any way agree or concede that Defendants have the  
18 burden of proof or persuasion on any of these issues. Defendants reserve the right to assert such  
19 additional affirmative defenses as discovery or subsequent events in this case indicate are proper.

20 **FIRST AFFIRMATIVE DEFENSE**

21 (Failure to State a Claim for Relief)

22 The Second Amended Complaint fails to state a claim upon which relief can be granted  
23 pursuant to F.R.C.P. 12(b)(6), as incorporated by F.R.B.P. 7012.

24 **SECOND AFFIRMATIVE DEFENSE**

25 (Statute of Limitations)

26 The Plaintiff's claims are barred by the applicable statutes of limitation set forth in 11 U.S.C.  
27 § 546 and California Civil Code § 3439.09.  
28

1 **THIRD AFFIRMATIVE DEFENSE**

2 (Failure to Mitigate)

3 Plaintiff is barred, in whole or in part, from recovering damages in this action due to Plaintiff's  
4 failure to mitigate his alleged damages, though Defendants deny that Plaintiff has sustained any  
5 damages at all. Plaintiff failed to take reasonable steps to mitigate and/or or avoid Plaintiff's alleged  
6 damages, if any, (of which the Plaintiff steps into the shoes of the Debtor) and or delayed  
7 unreasonably in doing so. Had Plaintiff timely and diligently taken reasonable steps to mitigate  
8 and/or avoid Plaintiff's alleged damages, and not exacerbated his damages, if any, such damages  
9 would have been reduced or eliminated altogether.

10 **FOURTH AFFIRMATIVE DEFENSE**

11 (Waiver/Release)

12 Plaintiff is barred, in whole or in part, from recovering damages in this action because he has  
13 waived or released the right, if any, to pursue those claims by reason of Plaintiff's own actions and  
14 course of conduct.

15 **FIFTH AFFIRMATIVE DEFENSE**

16 (No Damages)

17 Plaintiff is barred, in whole or in part, from recovering damages in this action because Plaintiff  
18 has not suffered any damages as a result of any act or omission of Defendants.

19 **SIXTH AFFIRMATIVE DEFENSE**

20 (Plaintiff's Own Conduct/Comparative Fault)

21 Plaintiff is barred, in whole or in part, from recovering damages in this action to the extent  
22 any of the alleged wrongs, or the acts or omissions, were by, or were the result of, Plaintiff's own  
23 conduct and, as a consequence, the Plaintiff contributed to any damage he claims he sustained.

24 **SEVENTH AFFIRMATIVE DEFENSE**

25 (No Proximate Cause)

26 Plaintiff is barred, in whole or in part, from recovering damages in this action because the  
27 losses that Plaintiff allegedly suffered were not proximately caused by any act or omission by  
28 Defendants.



1 **EIGHTH AFFIRMATIVE DEFENSE**

2 (Defendants Acted Reasonably)

3 Plaintiff is barred, in whole or in part, from recovering damages in this action because  
4 Defendants acted reasonably under the circumstances applicable, and in addition acted without  
5 committing a fraud or defalcation and without acting in a manner that willfully or maliciously caused  
6 injury to Plaintiff.

7 **NINTH AFFIRMATIVE DEFENSE**

8 (Unclean Hands)

9 Plaintiff is barred, in whole or in part, from recovering damages in this action by the doctrine  
10 of unclean hands, due to the acts, omissions, and/or knowledge of Plaintiff.

11 **TENTH AFFIRMATIVE DEFENSE**

12 (Laches)

13 Plaintiff is barred, in whole or in part, from recovering damages in this action by the doctrine  
14 of laches.

15 **ELEVENTH AFFIRMATIVE DEFENSE**

16 (Quantum Meruit)

17 Plaintiff is barred, in whole or in part, from recovering damages in this action because Plaintiff  
18 specifically asked for the services from Defendants and received the benefit of those services from  
19 Defendants.

20 **TWELFTH AFFIRMATIVE DEFENSE**

21 (*In Pari Delicto*)

22 The wrongful acts of the Debtor, which can be imputed to the Plaintiff, prevents the Plaintiff  
23 from recovering from the Defendants under the doctrine of *in pari delicto*.

24 **THIRTEENTH AFFIRMATIVE DEFENSE**

25 (Contemporaneous Exchange for New Value)

26 Defendants provided value at the same time or almost at the same time as they received the  
27 transfers alleged in the Second Amended Complaint.  
28

1 **FOURTEENTH AFFIRMATIVE DEFENSE**

2 (Subsequent New Value)

3 Defendants allege that they subsequently provided new value to the debtor after receiving the  
4 alleged transfers pursuant to 11 U.S.C. § 547(c)(4).

5 **FIFTEENTH AFFIRMATIVE DEFENSE**

6 (Ordinary Course)

7 Defendants assert that transfers they received were made in the ordinary course of business  
8 of the Debtor and the Defendants.

9 **SIXTEENTH AFFIRMATIVE DEFENSE**

10 (Good Faith/For Value)

11 Defendants assert they took funds from the Debtor in good faith and for reasonably equivalent  
12 value for the benefits they provided.

13 **SEVENTEENTH AFFIRMATIVE DEFENSE**

14 (Lack of Insolvency)

15 Defendants assert that the Debtor was not insolvent at the time of the transfers, did not lack  
16 sufficient capital, did not intend to incur debts beyond its ability to pay, and, as a consequence, the  
17 alleged transfers cannot be avoided as preferential and/or fraudulent transfers.

18 **EIGHTEENTH AFFIRMATIVE DEFENSE**

19 (No Intent to Hinder, Delay, or Defraud)

20 Defendants assert that (1) the Debtor and the transferee lacked the intent to hinder, delay,  
21 and/or defraud creditors of the Debtor, and (2) the alleged transfers were made for legitimate  
22 business purposes.

23 **NINETEENTH AFFIRMATIVE DEFENSE**

24 (Setoff and Recoupment)

25 Defendants assert that to the extent any of the alleged transfers are subject to avoidance, the  
26 Defendant or Defendants are entitled to setoff and recoupment for amounts owed by the Debtor to  
27 the Defendant or Defendants, which amounts equal or exceed any of the alleged transfers received.  
28

**TWENTIETH AFFIRMATIVE DEFENSE**

(Money Had and Received)

Defendants assert that the Defendants holds valid claims against the Debtor, its estate and the liquidating trust, based upon the common count of money had and received.

**TWENTY-FIRST AFFIRMATIVE DEFENSE**

(Open Book Account)

Defendants assert that the Defendants holds valid claims against the Debtor, its estate and the liquidating trust, based upon the common count of open book account.

**TWENTY-SECOND AFFIRMATIVE DEFENSE**

(Account Stated)

Defendants assert that the Defendants holds valid claims against the Debtor, its estate and the liquidating trust, based upon the common count of account stated.

**TWENTY-THIRD AFFIRMATIVE DEFENSE**

(Money Loaned)

Defendants assert that the Defendants holds valid claims against the Debtor, its estate and the liquidating trust, based upon the common count of money loaned.

**TWENTY-FOURTH AFFIRMATIVE DEFENSE**

(Quantum Valebant/Quantum Meruit)

Plaintiff is barred, in whole or in part, from recovering damages in this action because Plaintiff received goods and services from Defendants and received the benefit of those goods services from Defendants.

**PRAYER FOR RELIEF**

WHEREFORE, Defendants pray for relief as follows:

- A. That the Second Amended Complaint be dismissed with prejudice and in its entirety;
- B. That Plaintiff take nothing by reason of his Second Amended Complaint and that judgment be entered against Plaintiff and in Defendants' favor;
- C. That Defendants be awarded the costs incurred in defending this action, together with any legal fees to which Defendants might be entitled to by law; and

1 D. That Defendants be granted such further and additional relief as the Court may deem  
2 just and proper.

3 Dated: September 30, 2025

GOLDEN GOODRICH LLP

4  
5 By: /s/ David M. Goodrich  
6 David M. Goodrich  
7 Anerio V. Altman  
8 Attorneys for Defendants  
9  
10  
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## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:

**3070 Bristol St., Suite 640, Costa Mesa, CA 92626**

A true and correct copy of the foregoing document entitled (*specify*): **DEFENDANTS LEXICON CONSULTING LLC, UNITED PARTNERSHIPS, LLC AND VENTURA CONSULTING, LLC'S ANSWER TO TRUSTEE'S SECOND AMENDED COMPLAINT FOR (1) AVOIDANCE PRESERVATION OF PREFERENTIAL, RECOVERY, AND TRANSFERS MADE TO OR FOR CERTAIN DEFENDANTS MADE WITHIN NINETY DAYS OF THE PETITION DATE;(2) AVOIDANCE, RECOVERY, AND PRESERVATION OF POST-PETITION TRANSFERS MADE TO OR FOR THE BENEFIT OF CERTAIN DEFENDANTS;(3) AVOIDANCE OF DEBTOR'S EXECUTION OF REPAYMENT AGREEMENT WITH DEFENDANT OXFORD KNOX, LLC PURSUANT TO 11 U.S.C. §§ 548(a), 550, AND 551;(4) AVOIDANCE, RECOVERY, AND PRESERVATION OF FRAUDULENT TRANSFER(S) PURSUANT TO 11 U.S.C. §§ 548(a), 550, AND 551;(5) AVOIDANCE, RECOVERY, AND PRESERVATION OF FRAUDULENT TRANSFER(S) PURSUANT TO 11 U.S.C. §§ 548(a), 550, AND 551;(6) AVOIDANCE VOIDABLE, PRESERVATION, AND RECOVERY OF TRANSFERS MADE WITH INTENT TO DEFRAUD [11 U.S.C. §§ 548 (a), 550, AND 551; CAL. CIV. CODE §§ 3439.04(a)(2), AND 3439.07]; ((7)AVOIDANCE, PRESERVATION, AND RECOVERY OF VOIDABLE TRANSFERS MADE WITH NO INTENT TO DEFRAUD [11 U.S.C. §§ 548(a), 550, AND 551; CAL. CIV. CODE §§ 3439.04(a)(2), 3439.05, AND 3439.07]; (8) AVOIDANCE, RECOVERY, AND PRESERVATION OF FRAUDULENT TRANSFERS MADE TO OR FOR THE BENEFIT OF DEFENDANTS GILANI AND DOVALINA ARISING FROM USE OF AMERICAN EXPRESS CARD; AND (9) OBJECTION TO PROOF OF CLAIM NO 818 OF OXFORD KNOX, LLC** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner indicated below:

1. **TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF)**: Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) **September 30, 2025**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

**2. SERVED BY UNITED STATES MAIL:**

On (*date*) **September 30, 2025**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

☒ Service information continued on attached page

3. **SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (*state method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) \_\_\_\_\_, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

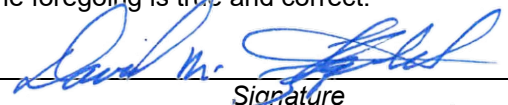
I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

September 30, 2025

*Date*

David M. Fitzgerald

*Printed Name*

  
*Signature*

**TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):**

Leslie A Cohen leslie@lesliecohenlaw.com, jaime@lesliecohenlaw.com; bryn@lesliecohenlaw.com  
David M Goodrich dgoodrich@go2.law, kadele@go2.law; dfitzgerald@go2.law; wggllp@ecf.courtdrive.com  
Yosina M Lissebeck Yosina.Lissebeck@Dinsmore.com, caron.burke@dinsmore.com; ayrton.celentino@dinsmore.com  
Richard A Marshack (TR) pkraus@marshackhays.com, ecf.alert+Marshack@titlexi.com  
Tyler Powell tyler.powell@dinsmore.com, lydia.tharp@dinsmore.com; wendy.yones@dinsmore.com  
United States Trustee (SA) ustpreion16.sa.ecf@usdoj.gov

**SERVED BY UNITED STATES MAIL:**

Honorable Scott C. Clarkson  
United States Bankruptcy Court  
Central District of California  
411 W. 4th St., Ste 5130/Ctrm 5C  
Santa Ana, CA 92701-4593